1	ISMAIL J. RAMSEY (CABN 189820) United States Attorney
2	MICHELLE LO (NYRN 4325163) Chief, Civil Division
3	SAPNA MEHTA (CABN 288238) Assistant United States Attorney
4	450 Golden Gate Avenue, Box 36055
5	San Francisco, California 94102-3495 Telephone: (415) 436-7478
6	FAX: (415) 436-6748 sapna.mehta@usdoj.gov
7	Attorneys for the United States of America
8	UNITED STATES DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA
10	SAN FRANCISCO DIVISION
11	SAN FRANCISCO DIVISION
12	IN RE: REQUEST FOR JUDICIAL) MISC. NO. 23-80084
13	ASSISTANCE FROM THE TWENTY-NINTH) CIVIL JUDGE FOR WRITTEN TRIALS OF)
14	THE SUPREME TRIBUNAL OF JUSTICE OF) APPLICATION FOR ORDER PURSUANT TO MEXICO CITY, MEXICO IN THE MATTER) 28 U.S.C. § 1782
15	OF IFM GLOBAL INFRASTRUCTURE) FUND, ET AL. v. PAULO JENARO DIEZ)
16	GARGARI.)
17	
18	Ismail Ramsey, United States Attorney for the Northern District of California, by the undersigned
19	Assistant United States Attorney, Sapna Mehta, petitions this Court for an Order pursuant to 28 U.S.C. §
20	1782(a), appointing Sapna Mehta, Assistant United States Attorney, Commissioner for the purposes of
21	obtaining information from Google LLC, Twitter, Inc., and Automattic Inc. Certain information has been
22	
23	requested by the Twenty-ninth Civil Judge for Written Trials of the Supreme Tribunal of Justice of Mexico
24	City, Mexico pursuant to three Letters of Request issued by that court in connection with a civil judicial
25	proceeding captioned IFM Global Infrastructure Fund, et al. v. Paulo Jenaro Diez Gargari, Foreign
26	Reference Number 288/2020.
27	
28	
	APPLICATION FOR ORDER PURSUANT TO 28 U.S.C. § 1782 MISC NO. 23-80084 1

The grounds for this Application are set forth in the Memorandum of Points and Authorities that has been simultaneously filed with this Application. A Proposed Order also accompanies this Application. Google LLC, Twitter, Inc., and Automattic Inc. all advised that they require a subpoena before providing the information requested by the court in Mexico. Google LLC and Automattic Inc. advised that they do not object to entry of the accompanying proposed order. Twitter, Inc. advised that it takes no position on entry of the proposed order. Respectfully submitted, DATED: March 22, 2023 ISMAIL J. RAMSEY United States Attorney /s/ Sapna Mehta SAPNA MEHTA Assistant United States Attorney